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11 **UNITED STATES DISTRICT COURT**
12
13 **DISTRICT OF NEVADA**

14 HILLCREST INVESTMENTS, LTD., a
15 Canadian Corporation; AMERGOSA
16 ENTERPRISE, LLC.,

17 Plaintiffs,

18 vs.

19 AMERICAN BORATE COMPANY, a foreign
20 corporation; AMERICAN BORATE
21 COMPANY of Texas, a foreign corporation;
22 STATE ENGINEER, STATE OF NEVADA;
23 DEPARTMENT OF CONSERVATION AND
24 NATURAL RESOURCES, DIVISION OF
25 WATER RESOURCES, a Nevada Political
26 Subdivision; RAMM CORPORATION, a
27 Nevada Corporation; UNITED STATES FISH
28 AND WILD SERVICE, a division of the
UNITED STATES; NATIONAL PARK
SERVICE, a division of the UNITED
STATES; DOES I – V; and ROES VI – X,

Defendants.

Case No. 2:21-cv-00964-RFB-NJK

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**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
HILLCREST INVESTMENTS, LTD.
TO FILE RESPONSE TO
DEFENDANTS' AMERICAN BORATE
COMPANY AND AMERICAN BORATE
COMPANY OF TEXAS' RENEWED
MOTION FOR SANCTIONS**

(EIGHTH REQUEST)

Plaintiff, HILLCREST INVESTMENTS, LTD. ("Hillcrest") and Defendants, AMERICAN BORATE COMPANY AND AMERICAN BORATE COMPANY OF TEXAS (collectively "American Borate") hereby stipulate and agree as follows:

Pursuant to the Court's Order approving the Seventh Stipulation for Extension of Time (ECF No. 80), the current deadline for Hillcrest to respond to American Borate's renewed motion for sanctions is October 14, 2022. Hillcrest's counsel, Karen L. Hanks, and Defendants' counsel, Debbie Leonard, have been diligently communicating about settlement and have exchanged initial

1 settlement offers, and counter-offers, with the latest offer being made on October 7, 2022.
2 Hillcrest's counsel requires additional information regarding one term of the counter-offer, which
3 Hillcrest is working on getting, and time to present the offer to her client. As a result, the parties
4 agree to extend Hillcrest's response deadline to November 4, 2022.

5 The parties do not seek this extension to cause delay or to prejudice any party.

6 Dated this 13th day of October, 2022.

7 **HANKS LAW GROUP**

8 **LEONARD LAW, PC**

9 */s/ Karen L. Hanks* _____
10 Karen L. Hanks, Esq.
11 Nevada Bar No. 9578
12 7625 Dean Martin Drive, Ste 110
13 Las Vegas, Nevada 89139
14 *Attorneys for Plaintiffs*

5 */s/ Debbie Leonard* _____
6 Debbie Leonard, Esq.
7 Nevada Bar No. 8260
8 955 South Virginia Street, Ste 220
9 Reno, Nevada 89502
10 *Attorney for American Borate Company and*
11 *American Borate Company of Texas*

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15 **IT IS SO ORDERED.**

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19 **RICHARD E. BOULWARE, II**
20 **United States District Court**

21 DATED this 17th day of October, 2022.

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